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Attorneys for the Official Committee
of General Unsecured Creditors

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS
BANKRUPTCY DIVISION

In re:

**IMPERIAL PACIFIC
INTERNATIONAL (CNMI) LLC,**

Debtor and Debtor in Possession.

Case No. 1:24-bk-00002

Chapter 11

**DECLARATION OF MICHAEL E.
SALZMAN IN SUPPORT OF:**

**FIRST INTERIM FEE APPLICATION OF
CHAMBERS LAW LLC, LOCAL
COUNSEL TO THE OFFICIAL
COMMITTEE OF GENERAL
UNSECURED CREDITORS, FOR
ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM May 24, 2024
THROUGH SEPTEMBER 30, 2024**

Hearing Date, Time and Location (ChST):

Date: December 13, 2024
Time: 9:00 a.m.
Location: 3rd Floor Courtroom 1671
Gualo Rai Rd., Gualo Rai
Saipan, MP 96950

Judge: Hon. Robert J. Faris

DECLARATION OF MICHAEL E. SALZMAN

I, Michael E. Salzman, under penalty of perjury, declare as follows:

1. I am an individual over the age of twenty-one (21), an attorney admitted to practice in New York, and the general counsel of Hughes Hubbard & Reed LLP (“Hughes Hubbard”), a duly appointed member and Chair of the Official Committee of Unsecured Creditors in the estate of the Imperial Pacific International (CNMI), LLC bankruptcy case (the “Committee”). I submit this declaration (the “Declaration”) in support of the *First Interim Fee Application of Chambers Law LLC, Local Counsel to the Official Committee of General Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from May 24, 2024 Through September 30, 2024* (the “Application”). All capitalized terms used herein shall have the meanings ascribed to them in the Application, unless otherwise defined.

2. The facts set forth in this Declaration are based upon Hughes Hubbard’s extensive knowledge of bankruptcy proceedings, my and other attorneys at Hughes Hubbard’s review of the relevant documents, information provided to me or verified by Chambers Law LLC, and my and other attorneys at Hughes Hubbard’s personal opinions based upon our experience, knowledge, and information provided to us. I am authorized to submit this Declaration on behalf of Hughes Hubbard as Chair of the Committee, and, if called upon to testify, I would testify competently to the facts set forth herein.

3. On or about May 14, 2024, the Office of the United States Trustee formed the Committee. On or about May 21, 2024, the Committee retained Chambers Law LLC (the “Firm”) to represent the Committee as local counsel.

4. I and other attorneys at Hughes Hubbard understand that Keith Chambers II is admitted to practice before this Court and has extensive general legal experience and knowledge on matters of Commonwealth law.

5. I and other attorneys at Hughes Hubbard reviewed the Application and the Firm’s standard rates for services. Based upon representations made to the Committee by the Firm, we understand that those rates are generally consistent with the Firm’s rates for comparable non-bankruptcy engagements and the billing rates and terms of other comparably skilled firms for

1 providing similar services. Based on these representations, Hughes Hubbard, as Chair of the
2 Committee, believes these rates are reasonable.

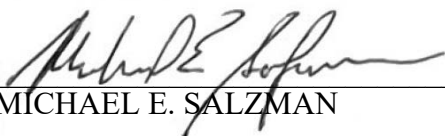
3 6. During the Fee Period, the Firm provided services to the Committee. As Committee
4 Chair, Hughes Hubbard is satisfied with the services that the Firm has provided, and believes that
5 the Firm has assisted the Committee and the estate with respect to this case.

6 7. The Committee has received each monthly fee statement from the Firm. Hughes
7 Hubbard has reviewed and approved these statements.

8 8. In its capacity as Chair of the Committee, Hughes Hubbard has received and
9 reviewed the Application and the related billing statements for payment of fees and reimbursement
10 of expenses for the Firm, and Hughes Hubbard and the Committee have no objection to the fees
11 and expenses requested in the Application. The Committee therefore consents to the approval and
12 payment of the Firm in accordance with their billing statements and as set forth in the Application.

13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
14 and correct.

15 Executed this 7th day of November 2024, at New York, New York.

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19 MICHAEL E. SALZMAN
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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2024, I caused the forgoing document to be filed with the Clerk of Court for the United States District Court for the Northern Mariana Islands, Bankruptcy Division, using the CM/ECF System. A true and correct copy of the said pleading has been served on all counsel of record via the Court's CM/ECF System.

Executed this 7th day of November, 2024.

/s/ Aram Ordubegian
Aram Ordubegian